

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22626

ROCKY RAFAEL FERNANDEZ NAVARRO,

Plaintiff,

vs.

SELENIS TECHNOLOGIES LLC,
VALERIO CERRON, AND
UWE CERRON,

Defendants.

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**PLAINTIFF'S SECOND MOTION FOR ISSUANCE OF ALIAS SUMMONS
BY THE CLERK OF COURTS**

Plaintiff, Rocky Fernandez, requests that the Clerk of this Court issue an amended alias summons to Defendant, Selenis Technologies, LLC, ("Selenis"), in the form appended hereto so that he may serve the Secretary of the State of Florida based on the following good cause:

1. Plaintiff filed its original motion for issuance for an alias summons on December 5, 2022, and incorporates the entirety of it by reference, including all exhibits, here. [ECF No. 17].
2. In short, that original motion alleges that Selenis and its officers are concealing their whereabouts due to numerous service attempts by Plaintiff. *Id.*
3. The Clerk of Courts issued an Alias Summons on December 6, 2022. [ECF No.19].
4. On December 7, 2022, Plaintiff mailed its request for substitute service on Selenis to the Secretary of State.

5. The Secretary of State rejected Plaintiff's request to serve Selenis because the alias summons does not state that Selenis is in the "care of" the Secretary of State.

6. Plaintiff thus requests that the Court issue the revised Alias Summons to Defendant, Selenis Technologies, LLC, so that it may obtain substitute service through the Secretary of the State of Florida. (Exhibit A).

WHEREFORE Plaintiff, Rocky Fernandez, respectfully requests the Clerk of this the Court to issue an Amended alias summonses in the form appended hereto.

Respectfully submitted this 21st day of January 2023.

s/Toussaint Cummings, Esq.
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